

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

Juan L. Torres,  
Debtor.

Case No. 18-14118-AMC

Chapter 13

**Motion to Modify Plan After Confirmation**

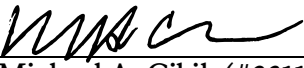
Debtor Juan L. Torres, through his attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on June 21, 2018. The plan was confirmed on February 6, 2019.
2. The Trustee has filed a motion to dismiss this case for failure to make plan payments.
3. The Debtor wants to amend his plan to resolve the dismissal motion.
4. The proposed plan cures the arrearage that gave rise to the dismissal motion by increasing the Debtor's monthly plan payments moving forward.
5. The Debtor requests that the Court enter an order approving the plan filed at ECF No. 100 as the new confirmed plan.
6. The Debtor will soon file a supplemental Schedule J as evidence of the Debtor's ability to fund the new plan.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: November 7, 2024

CIBIK LAW, P.C.  
*Counsel for Debtor*

By:   
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